



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

August 17, 2017

VIA ECF and BY HAND

Hon. George B. Daniels
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

**Re: *ACLU v. Dep't of Health and Human Services, et al.*, No. 17 Civ. 5514
(GBD) (GWG)—Request for extension of time to respond to the complaint**

Dear Judge Daniels:

This Office represents defendants the Department of Health and Human Services, the Department of Justice, the Department of Labor, and the Department of the Treasury (together, the “Government”) in the above-referenced proceeding brought pursuant to the Freedom of Information Act, 5 U.S.C. § 552 *et seq.* I write to request a thirty-day extension of time for defendants to respond to the complaint.

According to the docket, the Department of Labor’s response is due on August 18, 2017, and the other defendants’ responses are due on August 21, 2017. The Government requests that the responses of all defendants be due on September 20, 2017. Plaintiff consents to defendants’ request. This is the first request for an extension of time to respond to the complaint. If the Court grants this request, the parties respectfully request that the Court also adjourn the initial conference presently scheduled for October 3, 2017, by approximately thirty days.

We thank the Court for its consideration of these requests.

Respectfully submitted,

JOON H. KIM
Acting United States Attorney
Southern District of New York

By: s/ Michael J. Byars
MICHAEL J. BYARS
Assistant United States Attorney
Telephone: (212) 637-2793
Facsimile: (212) 637-2717
E-mail: michael.byars@usdoj.gov

cc: Joshua Block, Esq. (via ECF)

